



Part A

Chapter 2

Confidentiality Agreement and Security Guidelines

- **Introduction**
- **Significance of the Confidentiality Agreement**
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- **Compliance with Security Guidelines**
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Chapter 2

Summary

- **Introduction**

The Census Bureau is required by law to maintain the confidentiality of all information it collects from or about an individual. For this reason the Census Bureau requires that each local and tribal official who participates in the Address List Review understand and agree to abide by the confidentiality and security guidelines required by law.

- **Significance of the Confidentiality Agreement**

All individuals working with Address List Review materials must read and sign the Confidentiality Agreement so that they can participate in the Address List Review. You will not receive Address List Review materials until the Census Bureau receives a completed Confidentiality Agreement form.

- **Security Guidelines**

Protecting paper Census address list information.

Protecting computer-readable Census address list information.

- **Compliance with the Security Guidelines**

Workshops covering security guidelines and safeguarding addresses.

Unannounced onsite visits to ensure maintenance of confidentiality safeguards.

- **Return or Destruction of Census Bureau Materials**

All pages of the Census address list, all Add Pages with addresses entered, and all Census Bureau maps with corrections need to be returned to your RCC when you complete the Address List Review. Census Bureau material that do **not** show any changes must be destroyed using a process that will prevent any recognition or reconstruction of Census addresses. **Never deposit Census material that contain addresses in a trash or recycle container.**

All Census Bureau materials must be mailed either first class or priority. All parcels must be sent using shipping contractors who provide tracing services. Multiple packages containing Census Bureau materials must be sent and delivered as a unit.

Introduction

When the Census Bureau collects information from or about an individual, it is required by law to maintain the confidentiality of that information. The Census Bureau takes this responsibility very seriously and successfully protects the privacy of the data it collects. Respondents place their trust in the Census Bureau each time they complete a survey or an interview. This trust is critical to the success of the Census Bureau's mission. For this reason, the Census Bureau requires that each local and tribal official who participates in the Address List Review understand and agree to abide by the confidentiality and security guidelines outlined in this chapter.

This chapter provides you with general information about why the address information you will handle in the Address List Review is protected from disclosure, and provides specific guidelines for protecting paper address listings, paper maps that show individual addresses or housing units, and computer files of addresses. This chapter also includes guidelines for the required destruction of the Address List Review materials at the conclusion of the Address List Review.

Significance of the Confidentiality Agreement

You must complete and sign the Confidentiality Agreement so that your office, agency, or organization can participate in the Address List Review; a copy of this form is found in Appendix C. Each participating agency should designate a primary liaison for the Address List Review. This individual will be the primary contact between your organization and the Census Bureau's Regional Census Center staff for Address List Review activities. Also we consider all other individuals who will have access to the census address information as liaisons and they must sign the Confidentiality Agreement. Signatures on this form constitute an agreement by each individual to abide by the security guidelines outlined in this *Technical Guide*.

In addition to identifying the address review liaisons for your organization, section 4 of the Confidentiality Agreement provides space to confirm which geographic area(s) or jurisdiction(s) your organization represents for the purposes of this program. For example, a city's mayor and surrounding county officials together may decide to designate a regional planning organization to coordinate the review of all the Census addresses for the city and for the adjacent counties. If this is the case, indicate the specific areas represented in the appropriate space on the form (or use additional pages as necessary.)

It is important to note that the Census Bureau will not transmit the Address List Review materials for your area until we have received a completed Confidentiality Agreement from you.

Security Guidelines

We are providing you with the security requirements used by the Census Bureau in all its work facilities, and on all its computers. The Census Bureau accepts that the implementation of these guidelines may vary slightly from one Address List Review participant to another, but the end results must be the same for each participant -- nondisclosure of Title 13 information.

The primary Address List Review liaison accepts responsibility for protecting and safeguarding the Address List Review materials protected by Title 13, U.S.C. This includes any list that shows individual Census addresses and any maps that show individual housing unit locations (called "map spots.") These are referred to as "Census address information" in the remainder of this chapter. The primary liaison must restrict access to the Census address information to those individuals who have signed the Confidentiality Agreement. Signing the agreement commits each individual to upholding the Census Bureau's security requirements outlined below. Only individuals with a "need to know" to perform the Address List Review work should sign the Confidentiality Agreement.

As you read the Census Bureau's security requirements, please keep in mind the important role security plays in the overall responsibilities of each Address List Review liaison. The Census Bureau must have your full cooperation and commitment to following these guidelines. Together, we will maintain the privacy of the information entrusted to the Census Bureau by the Congress and the American public.

Protecting Census Address List Information On Paper

- Keep all Census address information in a locked room during nonwork hours. If possible, store the Census address materials in locked desks or cabinets.
- During work hours, do not leave a room unattended where Census address information is stored; lock the room whenever you leave it.
- Do not leave Census address information unattended at your desk.
- Only make copies of the information if required to complete your task; while making copies, do not leave the copying machine unattended.
- To fax a document containing Census address information to a Census Bureau location, make sure the document is properly labeled, verify the

fax number before sending and arrange for a Census Bureau employee to be at the fax machine to receive it.

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- Do not discuss the address information or locations of addresses with anyone who is not an Address List Review liaison or a Census Bureau employee.
 - Do not disclose precise, or even anecdotal information, about Census addresses or locations.

Protecting Computer-Readable Census Address List Information

- Operating systems, programs, applications, and data related to the review of Census addresses must be accessible only to Address List Review liaisons. The automated data processing (ADP) system should restrict the read, write, delete, and execute functions applicable to the Census addresses.
- The ADP system must use log-on routines that require user-id's and passwords using the following guidelines:
 - 1) Assign a unique user-id and password for each Address List Reviewer.
 - 2) Disable passwords after three bad attempts.
 - 3) Reject passwords that are the same as the user-id or that have been used within the last six months.
 - 4) Passwords must be at least six characters.
 - 5) Do not display passwords on terminals or printers.
 - 6) Encrypt passwords.
 - 7) Assign a 30 day expiration date to passwords.
 - 8) On new accounts, use expired passwords to force users to set new passwords.
- The ADP system must prevent bypassing log-on features.
- Computer screens must display a warning that states:
"This computer contains U.S. Census Bureau address information protected by Title 13 U.S.C.; unauthorized release of this information is punishable by fines or imprisonment."
- If Census address information is placed on a shared computer system, construct computer-readable security profiles to allow only Address List Reviewer access to the Census address information.
- If Census address information is to be transmitted over external networks, use dedicated lines or encrypt the data.

- Lock all rooms containing computers and all associated media during non work hours.

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- During work hours, do not leave computers with Census address information unattended; lock the room whenever you leave.
 - Label any diskettes containing Census address information "Disclosure Prohibited--13 U.S.C."
 - If possible, do not backup Census address information. If backup is necessary, do not send the tapes, cartridges or disks off-site and store them in a secured area.
 - Magnetic media (tapes, disks, hard drives) containing Census address information must be cleared prior to re-use. To clear, overwrite all sensitive data a minimum of three times using a commercial disk utility program or degauss using a commercial degausser.
 - Program any software you develop for displaying Census addresses to label each affected page of a printout containing Census address information with the following:

"THIS (list, report, etc.) CONTAINS INFORMATION, THE RELEASE OF WHICH IS PROHIBITED BY TITLE 13, U.S.C. AND IS FOR BUREAU OF THE CENSUS OFFICIAL USE ONLY."

Compliance with the Security Guidelines

The Census Bureau will conduct workshops covering all aspects of the Address List Review program. In addition, the workshops will provide an opportunity to review the security guidelines and safeguards to protect against illegal use of Census address information. Census Bureau staff conducting the workshops will help you decide who in your organization really needs to have access to the Census addresses and will review the civil and criminal penalties for improper or illegal use of the data.

Onsite Visits

To ensure that participating organizations are maintaining adequate confidentiality safeguards, the Census Bureau may make unannounced, onsite visits to review your organization's security procedures. The Census Bureau will strive not to disrupt your office's operations. A typical visit would include a review of:

- Storage and handling of Census address information.
- Employee access to Census address information.
- The physical safeguards of the computers, rooms, and buildings.

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- Instructions to employees about security.
- Data processing operations (including use of passwords).
- Employee awareness of their responsibilities to protect the confidentiality of the Census addresses.

Return or Destruction of Census Bureau Materials

The Census Bureau has specific guidelines for destroying and mailing Census confidential material. Once your organization has completed the review of the Census address list or map spotted maps, the reconciliation phase of the Address List Review, and any subsequent appeal, we require that the primary liaison verify that you have destroyed any remaining Census address materials using the guidelines provided in this section. A sample of the Destruction form is found in Appendix D. If your organization cannot comply with the guidelines for the destruction of the Census address materials, then you may return them by mail to the Census Bureau's Regional Census Center using a mailing label provided in the Address List Review materials and the mailing guidelines outlined below.

Destruction of Census Confidential Materials

- Never deposit Census confidential materials in a trash or recycle container.
- Store the materials in a secure area in a container labeled: "document destruction container" until they are destroyed.
- The destruction process must prevent recognition or reconstruction of the information. Use one of the methods below to destroy Census confidential materials:
 - 1) Shredding.
 - 2) Chemical decomposition.
 - 3) Pulverizing (for example, hammer mills, choppers, and so forth).
 - 4) Burning (only in a facility approved by the Environmental Protection Agency).
- Once you have selected a method of destruction, the Census Bureau's Regional Census Center staff will provide you with the precise specifications for the destruction method you have selected.

Instructions for Mailing and Shipping (if necessary)

- Seal and reinforce all packages.
- Enclose a letter to the Census Bureau's Regional Census Center notifying them of the shipment and listing its contents.

Mailing

- Mail Census confidential material first class (11 ounces or less), or priority mail (more than 11 ounces).
- Send parcels by certified or registered mail.

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- Use shipping contractors who provide tracing services such as certified mail, priority mail, Federal Express, United Parcel Services, and so forth.
 - Mail Census confidential material in two opaque, sealed envelopes, wrappings, or containers, durable enough to protect the material exposure or tampering. Label both sides of the inner envelope or wrapping with "DISCLOSURE PROHIBITED--13 U.S.C." Address the inner envelope to the Director, Census Bureau Regional Office. For the specific address information, please refer to the list of Census Bureau's Regional Census Centers included in Appendix A of this *Technical Guide*. The outer envelope or wrapping should be appropriately addressed but should **NOT** display the security classification designation.

Shipping

- Explain to carriers that multiple packages containing Census confidential material must travel and be delivered as a unit.